

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Robertson, Anschutz & Schneid, P.L. 6409 Congress Ave., Suite 100 Boca Raton, FL 33487 Telephone Number 561-241-6901 E-mail: jplean@rasflaw.com Attorneys For Secured Creditor JUSTIN D. PLEAN, Esq. (JP-5835)	CASE NO.: 17-11622-JNP CHAPTER 13 Objection to Confirmation of Debtor's Chapter 13 Plan
In Re: Ernest M Howard, Debtor.	

OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN

DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR GSAA HOME EQUITY TRUST 2007-4 ASSET-BACKED CERTIFICATES SERIES 2007-4 ("Secured Creditor"), by and through its undersigned counsel, objects to confirmation of Debtor's Chapter 13 Plan (DE # 3), and states as follows:

1. Debtor, Ernest M Howard, filed a voluntary petition pursuant to Chapter 13 of the Bankruptcy Code on January 27, 2017.
2. Secured Creditor holds a security interest in the Debtor's real property located at 308-310 D STREET, MILLVILLE, NJ 08332, by virtue of a Mortgage recorded on January 08, 2007 at Instrument number 265291 of the Public Records of Atlantic County, NJ. Said Mortgage secures a Note in the amount of \$97,250.00.
3. The Debtor filed a Chapter 13 Plan on January 27, 2017.
4. The Plan includes payments toward the Note and Mortgage with Secured Creditor, however the figures used by the Debtor are inaccurate. It is anticipated that Secured Creditor's claim will show the pre-petition arrearage due Secured Creditor is \$17,023.36, whereas the Plan proposes to pay only \$7,120.29. Therefore, the Plan is not in compliance with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot

be confirmed. Secured Creditor objects to any plan which proposes to pay it anything less than \$17,023.36 as the pre-petition arrearage over the life of the plan.

WHEREFORE, Secured Creditor respectfully requests this Court sustain the objections stated herein and deny confirmation of Debtor's Plan, and for such other and further relief as the Court may deem just and proper.

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Attorneys For Secured Creditor

By: /s/ JUSTIN D. PLEAN

JUSTIN D. PLEAN, Esquire

NJ Bar Number: JP-5835

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Robertson, Anschutz & Schneider, P.L. 6409 Congress Ave., Suite 100 Boca Raton, FL 33487 Telephone Number 561-241-6901 E-mail: jplean@rasflaw.com Attorneys For Secured Creditor JUSTIN D. PLEAN, Esq. (JP-5835)	CASE NO.: 17-11622-JNP CHAPTER 13 Objection to Confirmation of Debtor's Chapter 13 Plan
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CERTIFICATION OF SERVICE

1. I, Justin Plean, represent DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR GSAA HOME EQUITY TRUST 2007-4 ASSET-BACKED CERTIFICATES SERIES 2007-4 in this matter.
2. On 2/17/2017, I caused a copy of the following pleadings and/or documents to be sent to the parties listed in the chart below.
3. I certify under penalty of perjury that the above documents were sent using the mode of service indicated.

2/17/2017

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Attorneys For Secured Creditor

By: /s/ JUSTIN D. PLEAN
JUSTIN D. PLEAN, Esquire
NJ Bar Number: JP-5835

Name and Address of Party Served	Relationship of Party to Case	Mode of Service
Bruno Bellucci, III BellucciLaw, P.C. 1201 New Rd. Suite 138 Linwood, NJ 08221	Debtor(s) Attorney	<input type="checkbox"/> Hand Delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*)
Isabel C. Balboa Chapter 13 Standing Trustee Cherry Tree Corporate Center 535 Route 38 - Suite 580 Cherry Hill, NJ 08002	Trustee	<input type="checkbox"/> Hand Delivered <input type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*)
Ernest M Howard 21 Morning Glory Court Egg Harbor Township, NJ 08234	Debtor(s)	<input type="checkbox"/> Hand Delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified Mail/RR <input type="checkbox"/> E-Mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by court*)

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.